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January 16, 2025

## VIA ECF

Hon. John P. Cronan, U.S.D.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1320  
New York, NY 10007

Re: *United States v. Dalpour*, Case No. 1:24-cr-00264-JPC

Dear Judge Cronan:

We write on behalf of both parties in the above-captioned matter and pursuant to the Court's Individual Rule 1.E. to respectfully request an extension of the January 28, 2025 deadline to submit a joint letter proposing a schedule for the filing of pretrial motions as well as an adjournment of the status conference currently scheduled for February 18, 2025. This is the parties' fourth request for an extension of time to submit a joint letter proposing a schedule for the filing of pretrial motions and the status conference in this matter; the Court granted the parties' first request on July 12, 2024 (ECF No. 35.), the second request on September 10, 2024 (ECF No. 41), and the third request on November 11, 2024 (ECF No. 44).

As previously disclosed to the Court, discovery remains ongoing in this matter. The defense is awaiting the production of what is expected to be a significant volume of material as it continues to make progress reviewing the government's prior productions. The materials defense counsel expects to receive from the government include materials seized from Mr. Dalpour's office, the contents of the mobile phone seized from Mr. Dalpour, and information regarding the monetary amounts that appear in the Indictment. It is anticipated that review of such information will require a considerable amount of time once it is received, and that only following receipt and preliminary review of such information would the defense be in a position to have an informed conversation with the government regarding potential pre-trial motions or, for that matter, any potential disposition of this matter short of trial.

For these reasons, the parties respectfully request (i) an adjournment – to April 29, 2025 – of the January 28, 2025 deadline to submit a joint letter proposing a schedule for the filing of pretrial motions in this matter, and (ii) a corresponding adjournment – to May 20, 2025 – of the status conference currently scheduled for February 18, 2025. The parties also agree to the

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exclusion of the time until a May 20, 2025, status conference under the Speedy Trial Act, as such an exclusion would serve the ends of justice. *See* 18 U.S.C. § 3161(h)(7)(A).

The parties have met and conferred regarding this joint request.

Respectfully submitted,

/s/ Jenny Kramer

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The request is granted. The deadline to submit a joint letter proposing a schedule for the filing of pretrial motions is adjourned to April 29, 2025. The status conference currently scheduled for February 18, 2025, is adjourned to May 20, 2025, at 9:00 a.m. The Court will exclude time until May 20, 2025, under the Speedy Trial Act to allow the defense to review discovery materials. The Court finds that the ends of justice served by that exclusion outweigh the best interest of the public and the Defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A).

SO ORDERED  
January 17, 2025  
New York, New York

  
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JOHN P. CRONAN  
United States District Judge